

ORIGINAL

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

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OFFICE OF THE CONSUMER ADVOCATE

Mailing Online Service

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Docket No. MC98-1

OFFICE OF THE CONSUMER ADVOCATE
INTERROGATORIES TO UNITED STATES POSTAL SERVICE
WITNESS: LEE GARVEY
(OCA/USPS-T1-71-72)
(November 12, 1998)

Pursuant to sections 25 and 26 of the Rules of Practice of the Postal Rate Commission, the Office of the Consumer Advocate hereby submits interrogatories and requests for production of documents. Instructions included with OCA interrogatories OCA/USPS-T1-1-7 to witness Lee Garvey, dated July 21, 1998, are hereby incorporated by reference.

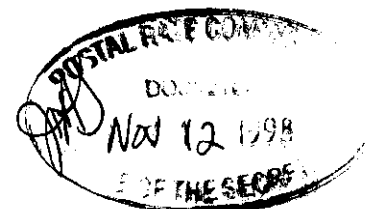
Respectfully submitted,

Gail Willette

Gail Willette
Acting Director
Office of the Consumer Advocate

Emmett Rand Costich

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Acting Assistant Director



OCA/USPS-T1-71. Please refer to your response to part e. of interrogatory

OCA/USPS-T1-47. You state, "The Commission has specified that the market test data collection plan encompass mailpiece characteristics data (which include job types and page counts) and hard copy mailing statements. No data beyond these are available regarding presort discount qualification, although inferences can be made from the characteristics data."

- a. Please confirm that the Commission also stated, "[T]he Commission includes depth of sort information in the data collection plan. . . . [I]f the mailing statements provide the level of sort achieved on each batch submitted to the Business Mail Entry Unit, even though a single automation basic rate is being applied for all pieces, then the provision of these statements will be sufficient. However, if mailing statements do not reflect the depth of sort for each mailing that results from a Mailing Online Batching operation, then the Service *must* find an alternative means of providing the depth of sort data for each batch." PRC Op. MC98-1, October 7, 1998, at 44-45 (emphasis added). If you do not confirm, please explain.
- b. Please confirm that mailing statements submitted with MOL batches "do not reflect the depth of sort for each mailing" See Tr. 2/243-44. If you do not confirm, please provide a copy of a mailing statement for an MOL batch that "reflects depth of sort" for that batch.
- c. Please confirm that the Commission has mandated collection of depth-of-sort data on a batch-by-batch basis for MOL during the market test. If you do not confirm, please provide your interpretation of the word "must."

- d. Please identify specifically where in "the first weekly report" the depth-of-sort data requested by the Commission appear.
- e. Please confirm that the "market test" currently being conducted is unauthorized by the Commission, as the test contains no provision for collecting data included in the Commission's mandated data-collection plan. If you do not confirm, please explain. If you cannot answer this question, please refer it to the Postal Service for response.


OCA/USPS-T1-72. Please refer to your response to interrogatory OCA/USPS-T1-48.

- a. In your response to part a. of that interrogatory you state, "The mailing statement is indeed transmitted by the system along with the print files as my testimony indicates; however no provision was made for the statement to be stored and/or forwarded anywhere else." Please explain why it would take longer than ten minutes to modify the computer code for the MOL system so that electronic mailing statements could be "stored and/or forwarded" elsewhere. Please provide a copy of the computer code that creates and forwards mailing statements to print sites.
- b. In part c. of your response to that interrogatory you state, "The Mail.dat opportunity was discovered during phone conversations with Postalsoft company representatives and was subsequently communicated to the MOL system developer by phone."
 - i. Is the MOL system developer currently implementing the "Mail.dat opportunity"? If not, why not?

- ii. As of November 12, 1998, how many hours has the system developer devoted to implementing the "Mail.dat opportunity"?
 - iii. Please explain why it would take longer than ten minutes to modify the computer code for the MOL system so as to implement the "Mail.dat opportunity."
 - iv. Please provide a copy of the computer code that needs to be modified to implement the "Mail.dat opportunity."
- c. In part d. of your response to that interrogatory you state, "The request for investigation of an option to associate mailing statements with batch numbers was communicated to the MOL system developer by telephone."
 - i. Is the MOL system developer currently implementing the "option to associate mailing statements with batch numbers"? If not, why not?
 - ii. As of November 12, 1998, how many hours has the system developer devoted to implementing the "option to associate mailing statements with batch numbers"?
 - iii. Please explain why it would take longer than ten minutes to modify the computer code for the MOL system so as to implement the "option to associate mailing statements with batch numbers"?
 - iv. Please provide a copy of the computer code that needs to be modified to implement the "option to associate mailing statements with batch numbers"?

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the rules of practice.


Emmett Rand Costich
Attorney

Washington, D.C. 20268-0001
November 12, 1998